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January 24, 2023

By eFile

The Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
Thurgood Marshall
40 Foley Square
New York, NY 10007

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Re: *Katherine Yost v. Everyrealm et al.*, Case No. 1:22-cv-06549(PAE)(SLC)

Dear Judge Engelmayer:

Currently pending before the Court is a motion by Everyrealm Inc. (fka Republic Realm Inc.), Janine Yorio, Zach Hungate and William Kerr to compel arbitration.

On the afternoon of January 23, 2023, Everyrealm located a second arbitration agreement between itself and Ms. Yost, and it provided that agreement to the undersigned.

The agreement – entitled “Worksite Employee Acknowledgement” – is dated January 24, 2022, and it was generated and maintained by Justworks, Everyrealm’s outsourced provider of certain human resources support. The agreement is between “Katherine Yost,” Republic Realm Inc., and Justworks. Paragraph 10 of the agreement addresses arbitration. This newly-discovered agreement post-dates Yost’s January 21, 2022 Employment Letter Agreement previously submitted to the Court. (See doc. 12-2).

While employed by Everyrealm as Head of Human Resources, Ms. Yost worked with Justworks on the preparation and delivery of these documents to employees.

In furtherance of our duty of candor to the Court, we submit the newly-located January 24, 2022 “Worksite Employee Acknowledgement,” attached hereto as Exhibit A.

Respectfully submitted

/s/ Lloyd B. Chinn

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